

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE VANGUARD CHESTER FUNDS
LITIGATION

Case No. 2:22-cv-955-JFM

JOINT STIPULATION & [PROPOSED] SCHEDULING ORDER

Plaintiffs Haifan Liang, Julia Lucas, Donald R. Lichtenstein, Samuel B. Skraly, Ardes Poisson, Valerie M. Verduce, John Harvey, Caitlin Brigham, Jeffrey Chaussee, Zeb Bradford, Benjamin Deming, and James Daily (collectively, “Plaintiffs”), and Defendants The Vanguard Group, Inc., Vanguard Chester Funds, Mortimer J. Buckley, John Bendl, Christine M. Buchanan, and John E. Schadl, Emerson U. Fullwood, Amy Gutmann, F. Joseph Loughrey, Mark Loughridge, Scott C. Malpass, Deanna Mulligan, André F. Perold, Sarah Bloom Raskin, and Peter F. Volanakis (collectively, “Defendants,” and together with Plaintiffs, the “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, the outstanding case deadlines set in the Court’s December 21, 2023 Order (Dkt. No. 112) were stayed by the Court’s September 23, 2024 Order (Dkt. No. 145);

WHEREAS, the Court on June 2, 2025 denied the Parties’ Joint Stipulation requesting to continue that stay (Dkt. No. 191) and ordered that the Parties propose a scheduling order for the case that allows reasonable amount of time for the Parties to focus on near-term settlement efforts (Dkt. No. 192);

WHEREAS, after further discussions, the Parties have scheduled a renewed mediation with the Honorable Layn R. Phillips (Ret.) to take place on Thursday, July 31, 2025, which was the earliest date on which the mediator and Parties were all available;

WHEREAS, the Court on October 25, 2024 denied as moot Plaintiffs' motion for class certification and appointment of class representatives and class counsel (Dkt. No. 125) and Defendants' motion to strike Plaintiffs' reply memorandum and reply expert reports (Dkt. No. 142) with leave to renew if ever necessary (Dkt. No. 146);

NOW, THEREFORE, the Parties through their undersigned counsel, hereby agree, stipulate, and respectfully request that the Court enter an Order as follows:

1. The outstanding deadlines in this Action are hereby stayed through **Thursday, August 7, 2025**.
2. If the stay expires and the Parties have not notified the Court that they have reached an agreement in principle to resolve all claims in this Action, the Parties shall refile the class certification briefing (Dkt. Nos. 125–27, 135, 137–38, 141–42) no later than **Thursday, August 14, 2025**.
3. Plaintiffs' opposition to Defendants' previously filed motion to strike (Dkt. 142) shall be filed no later than **Thursday, August 21, 2025**; Defendants' reply to the same shall be filed no later than **Thursday, August 28, 2025**.
4. All fact discovery shall be completed no later than **Wednesday, November 12, 2025**.
5. Affirmative expert reports shall be served no later than **Friday, December 12, 2025**.
Responsive expert reports, if any, shall be served no later than **Tuesday, January 13, 2026**.
Reply expert reports, if any, shall be served no later than **Thursday, February 12, 2026**.
Expert depositions, if any, shall be concluded no later than **Thursday, March 12, 2026**.
6. Motions for summary judgment shall be filed no later than **Wednesday, April 15, 2026**.
Responses shall be filed no later than **Friday, May 15, 2026**. Motions for summary judgment and responses shall be filed in the form prescribed in Judge Murphy's Scheduling

and Motion Policies and Procedures. Replies shall be filed no later than **Friday, May 29, 2026.**

7. Further dates will be scheduled at a later time if necessary.

Respectfully submitted,

Dated: June 6, 2025

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Dated: June 6, 2025

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IT IS SO ORDERED this _____ day of _____, 2025.

HONORABLE JOHN F. MURPHY
UNITED STATES DISTRICT COURT JUDGE